

# Exhibit C.

**DECLARATION OF MIRANDA OAKLEY**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

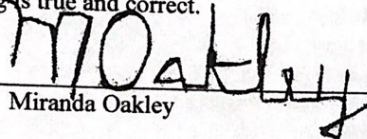
1. My name is Miranda Oakley. I am a resident of Rhode Island, over 18 years old, and competent to make this declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts.
2. I am thirty-two years old and currently reside in South Kingstown, Rhode Island with my mother and grandmother. Unfortunately, my grandmother is unable to serve as a witness.
3. I am blind. This means that I am unable to drive, so leaving my house requires someone to take me. It also means that I necessarily engage in high levels of touch when navigating, as I use my hands to see.
4. I regularly vote in federal, state, and local elections, and plan on voting in the September and November 2020 elections. I have been registered to vote in Rhode Island since September 2006. Voting is incredibly important to me. It is especially important for me to vote to ensure that the disability community is represented in politics. I want to push back on people's perceptions that blind people do not vote and to speak up about the issues that matter.
5. Based on news coverage, I am aware that the virus that causes COVID-19 is highly contagious and spreads through a variety of means, including respiratory droplets, touching surfaces with those droplets on them, and contact between individuals. I understand that while some infected individuals experience no symptoms or only mild symptoms from COVID-19, others become seriously ill, sometimes with severe buildup of fluid in their lungs that can lead to death.
6. I also understand that some people are particularly vulnerable to becoming severely sick from COVID-19—specifically, people over 65 and people of any age who are immunocompromised, or have other underlying conditions like asthma, heart conditions, chronic lung disease, diabetes, or obesity.
7. My contracting COVID-19 could be very detrimental to myself and my family. My grandmother's old age makes her especially at risk to become severely ill or die from COVID-19. If I contracted COVID-19 and passed it on to her, it could put her at risk of death. Second, my mother works with the elderly. If I contracted COVID-19 and passed it on to her, it would put all of the elderly people that my mother works with at risk as well.
8. I voted by mail for the first time in the June 2020 presidential preference primary. Prior to that, I have always voted in person at my polling place. During that primary election, the witnesses requirement for voting by mail was suspended so I didn't have to find witnesses to sign my mail ballot.
9. Since the start of the pandemic, myself, my mother, and my grandmother have been closely following social distancing guidelines to protect ourselves and the elderly people my mother works with. When interacting with others, I wear a facemask and keep as much of a distance as I can, except from anyone I need to guide me. I strive to keep my interactions with individuals outside my household limited.
10. Voting in person would involve waiting in line with other voters, interacting with poll workers, and, due to my blindness, touching not just voting equipment, but also many more surfaces all of which might be contaminated. My mother would also have to go to the polls with me, risking contamination herself, due to the fact that I cannot drive. I am



concerned that the prolonged exposure to other individuals and potentially contaminated surfaces at a crowded polling place would put me at serious risk of contracting COVID-19.

11. The two witness/notary requirement means that I would have to invite a person into my home, or I would have to travel outside my home along with a driver to interact with a second witness. Either of these situations would violate the social distancing rules I have been following to the best of my ability and increase the likelihood that I contract COVID-19 and pass it to my mother or grandmother.
12. If the witness requirement stays in place through the pandemic, I do not know whether I will be able to vote by mail in the September or November 2020 elections. I should not have to choose between risking the lives of myself, my grandmother, and mother's clients or giving up my fundamental right to vote. I consider the two witness/notary requirement under these pandemic circumstances to be a form of voter suppression.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Miranda Oakley

Executed on 7-20-2020